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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
NATASHA SEVERIN and GALINA
COTOVA, Individually and on
Behalf of All Others No. 10 CIV 9696(DLC)
Similarly Situated,
Plaintiffs,
- against -
PROJECT OHR, INC., METROPOLITAN
COUNCIL ON JEWISH POVERTY and
D'VORAH KOHN,
Defendants.
-----X

DEPOSITION OF NATASHA VITTORIA SEVERIN
New York, New York
Tuesday, September 20, 2011

Reported by:
ANNETTE ARLEQUIN, CCR, RPR
JOB NO. 41748

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1 N. Severin
 2 me on a weekly basis, how often would you
 3 perform that task?
 4 MS. SMITH: Objection to the form.
 5 A. Once.
 6 Q. What does the word "monthly" mean?
 7 A. Every month.
 8 Q. If I asked you to perform a task for
 9 me on a monthly basis, how often would you
 10 perform that task?
 11 MS. SMITH: Objection.
 12 A. Once a month.
 13 Q. If I asked you to perform a task for
 14 me on an as-needed basis, how often would you
 15 perform that task?
 16 MS. SMITH: Objection.
 17 A. As often as you require this.
 18 MR. ARNOLD: I'm going to mark this
 19 as Defendants' Exhibit No. 4.
 20 (Defendants' Exhibit 4, Plan of Care,
 21 Bates stamped D02451, marked for
 22 identification, as of this date.)
 23 BY MR. ARNOLD:
 24 Q. Ms. Severin, do you recognize this
 25 document?

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1 N. Severin
 2 this was marked.
 3 Q. When you worked for a client, would
 4 you see their Plan of Care?
 5 A. In those years, yes.
 6 Q. Would you review the Plan of Care?
 7 A. Well, immediately when we enter the
 8 case, we review the Plan of Care.
 9 Q. Were you required to follow the Plan
 10 of Care when providing assistance to the client?
 11 A. Yes. Yes, of course.
 12 Q. Where would a Plan of Care be located
 13 inside a client's home?
 14 A. Well, they're not secret so they are
 15 not kept away. They are attached to the
 16 refrigerators.
 17 Q. Did you ever discuss a client's Plan
 18 of Care with anyone at Project OHR?
 19 A. I would discuss separate tasks rather
 20 than the plan as a whole.
 21 Q. Who would you discuss these separate
 22 tasks with at Project OHR?
 23 A. If there were problems or
 24 difficulties, I would discuss it with Miriam.
 25 Q. Miriam. Okay.

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1 N. Severin
 2 A. Yes. This is the Plan of Care.
 3 Q. Were documents like this document
 4 Bates stamped D02451, were they discussed during
 5 the orientation?
 6 A. I don't remember.
 7 Q. Do you remember reviewing a sample
 8 Plan of Care at your orientation?
 9 A. I don't remember.
 10 Q. What is the purpose of the Plan of
 11 Care?
 12 A. We need to know what the patient
 13 needs and how we can help this patient.
 14 Q. And did each client have their own
 15 Plan of Care?
 16 A. Yes.
 17 Q. Does the information contained in
 18 each client's Plan of Care differ depending on
 19 the client's needs?
 20 A. I don't understand the question.
 21 Q. Would the information contained in
 22 one client's Plan of Care differ from another
 23 client's Plan of Care?
 24 A. Well, the list of the tasks remains
 25 the same, but each page has its own needs and

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1 N. Severin
 2 Did you ever discuss with anyone at
 3 Project OHR information contained on the Plan of
 4 Care?
 5 A. Miriam and the nurse.
 6 Q. Other than attending the orientation,
 7 did you ever attend any other training session
 8 while employed at Project OHR?
 9 A. They regularly hold in-service
 10 sessions once every half a year.
 11 Q. As part of your training were you
 12 ever required to go to a client's home with
 13 another Project OHR employee to learn how to
 14 care for a client?
 15 A. No, never.
 16 MR. ARNOLD: Could we mark this as
 17 Defendants' Exhibit No. 5. It's a document
 18 Bates stamped D01265 to D01266.
 19 (Defendants' Exhibit 5, Project OHR
 20 document of three hour in-service training
 21 session, Bates stamped D01265 through 266,
 22 marked for identification, as of this
 23 date.)
 24 (Document review.)
 25 BY MR. ARNOLD:

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1 N. Severin
 2 practice.
 3 Q. Wasn't it the nurse's responsibility
 4 to complete a Plan of Care?
 5 A. Yes, usually the nurse does it.
 6 Q. And it was your job to follow the
 7 Plan of Care; is that right?
 8 A. Yes.
 9 Q. Did you ever have any client who
 10 slept through an entire night?
 11 A. No.
 12 Q. So you mentioned that you provided
 13 care for over, possibly over 100 clients during
 14 your six years of employment.
 15 It's your testimony today that not
 16 one single client on one single night slept
 17 through the entire night?
 18 A. Of course, because otherwise why
 19 would we be employed there if they sleep this
 20 long for the night?
 21 Q. So just to get an actual answer to my
 22 question, is it your testimony that during your
 23 time of employment where you provided care for
 24 over 100 clients, not one of them ever slept
 25 through the night?

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1 N. Severin
 2 A. Why would I want to ask for that?
 3 Q. I don't know. I asked you if you
 4 ever asked for that. It's either a yes or no
 5 answer.
 6 A. No.
 7 Q. Did a client ever just wake up, get
 8 confused and go back to sleep under a minute?
 9 A. Yes.
 10 Q. Did a client ever wake up having
 11 soiled themselves and you had to change them,
 12 and then they went back to sleep?
 13 A. Yes.
 14 Q. Did you ever write down anywhere the
 15 times you would wake up at night to service a
 16 client?
 17 A. No.
 18 Q. And why didn't you write that down?
 19 MS. SMITH: Objection.
 20 A. Why would I want it, to do it?
 21 Q. That's why I'm asking you.
 22 A. They have never asked us to do it.
 23 Q. Does Ms. Kogan's Plans of Care
 24 indicate that you should clean her bedroom?
 25 A. She didn't have a bedroom as such.

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1 N. Severin
 2 A. No.
 3 Q. Did you ever have a client that just
 4 woke up once during the night?
 5 A. I don't remember.
 6 Q. But you remember that your clients
 7 never slept through the night, that's right?
 8 A. No, didn't sleep through night.
 9 Q. But you don't remember if a client
 10 just woke up once during the night?
 11 A. That would have been a very lucky
 12 situation for me, but however, it didn't happen.
 13 Q. So you never had one client who just
 14 woke up once during the entire night.
 15 MS. SMITH: Objection.
 16 A. I don't remember.
 17 Q. Did you ever have a client that just
 18 woke up two times during the night?
 19 A. Usually they give me clients who woke
 20 up very many times.
 21 Q. And why would they give you clients
 22 like that?
 23 A. I don't know.
 24 Q. Did you ever ask for clients who woke
 25 up a lot of times?

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1 N. Severin
 2 She had a studio.
 3 Q. Did you ever have a client that had a
 4 cleaning service come in to clean their
 5 apartment?
 6 A. I don't remember.
 7 Q. Did you ever have a client whose
 8 relative or friend came to the apartment and
 9 cleaned up the apartment?
 10 A. No.
 11 Q. Did Project OHR have a policy that
 12 prohibited you from cleaning up after a client's
 13 family members?
 14 A. No.
 15 Q. When you attended the orientation
 16 back when you started your employment, did you
 17 receive an employee handbook?
 18 A. I don't remember.
 19 MR. ARNOLD: Mark this as Exhibit 12.
 20 (Defendants' Exhibit 12, Signature
 21 Verification, Bates stamped D01305, marked
 22 for identification, as of this date.)
 23 BY MR. ARNOLD:
 24 Q. I'm showing you what's been marked as
 25 Defendants' Exhibit 12, a document Bates stamped

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1 N. Severin
2 the Defendants' Exhibit No. 10?
3 (Document review.)
4 Q. If you can please turn to the page
5 that's marked P17?
6 (Witness complies.)
7 Q. Earlier we looked at the fifth
8 paragraph down that reads, among other things,
9 "Home attendants are neither required nor
10 permitted to perform heavy duty cleaning
11 tasks..." and then several are listed.
12 Do you remember that?
13 A. Yes.
14 Q. Ms. Severin, when you were employed
15 by Project OHR, did you ever wash windows or
16 blinds for an OHR client?
17 A. Very often.
18 Q. And when you were employed by Project
19 OHR, did you ever move furniture at OHR clients'
20 houses?
21 A. Yes.
22 Q. Can you say how often?
23 A. For a client like Clara Lazar, almost
24 daily.
25 Q. Did you ever wax floors when you were

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1 N. Severin
2 Q. Ms. Severin, could you please turn to
3 the document that's marked Defendants' Exhibit
4 No. 9?
5 It's the Plan of Care for
6 Ms. Baransky.
7 (Document review.)
8 Q. Ms. Severin, isn't it true that when
9 you were working for Ms. Baransky, there were
10 weeks when you worked four days in a row without
11 leaving her house; is that right?
12 MR. ARNOLD: Object.
13 A. Yes, when I worked on replacement.
14 Q. And there were times when you would
15 work two days in a row or 48 hours consecutively
16 when you worked for Ms. Baransky; is that right?
17 MR. ARNOLD: Object.
18 A. Yes.
19 Q. When you worked for more than one day
20 in a row for Ms. Baransky, did anybody else come
21 into her house to do any household cleaning
22 chores?
23 A. Nobody.
24 Q. So if, for example, you were working
25 for Ms. Baransky's house for four days in a row,

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1 N. Severin
2 employed by Project OHR for OHR's clients?
3 A. They didn't have floors that required
4 waxing.
5 Q. And when you were employed by Project
6 OHR, did you ever do laundry by hand for any of
7 OHR's clients?
8 A. Very often, several times a day.
9 Q. Ms. Severin, can you look at a
10 document marked as Defendants' Exhibit No. 7?
11 (Document review.)
12 A. Yes.
13 Q. Do you recall writing this letter?
14 A. Yes.
15 Q. What were the circumstances that led
16 to you deciding to write this letter?
17 A. At the time I worked on Baransky
18 case, I completely forgot what is it to sleep
19 through the night. Well, I was very tired and I
20 was frightened to learn that such jobs exist at
21 all.
22 Q. Was there anything else that you
23 remember about the circumstances that caused you
24 to write that letter?
25 A. No.

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1 N. Severin
2 would anybody else come in during those four
3 days to do any kind of household chores?
4 A. Nobody.
5 Q. And when you were working at
6 Ms. Baransky's house, did you dust -- how often
7 did you dust, vacuum or mop?
8 MR. ARNOLD: Object.
9 A. Well, every day and probably I mopped
10 several times a day because I like to work in
11 clean environment.
12 Q. And when you were working for
13 Ms. Baransky, how often did you clean her
14 bathroom?
15 A. Every day.
16 Q. When you were working for
17 Ms. Baransky, how often did you clean her
18 kitchen?
19 A. Once or twice a day.
20 Q. And when you were working for
21 Ms. Baransky, how often did you clean her
22 refrigerator?
23 A. [In English] Weekly.
24 [Through the Interpreter] Weekly.
25 Q. Could you please turn to Defendants'